

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MITZIE POTHARAJ,	:	CIVIL ACTION
Plaintiff	:	
	:	
v.	:	NO. 2:15-cv-00861-GP
	:	
NORTHLAND GROUP, INC.,	:	
Defendant	:	JURY TRIAL DEMANDED

**OFFER OF JUDGMENT**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Northland Group, Inc. (hereinafter referred to as “NGI”), by and through its undersigned counsel, hereby offers to allow judgment to be taken against it in favor of Mitzie Potharaj (hereinafter referred to as “Plaintiff”) on all of Plaintiff’s claims, pursuant to the following terms:

1. Judgment shall be entered in the amount of \$1,526.00, inclusive of all attorneys’ fees and costs, against NGI arising from all of Plaintiff’s claims against NGI as alleged in Plaintiff’s Complaint filed in the above-captioned matter.

2. The judgment entered in accordance with this Offer of Judgment is to be in total settlement of all of Plaintiff’s claims in the above-captioned case against NGI and its current and former employees, owners, and agents, and said judgment shall have no effect whatsoever except in settlement of those claims.

3. This Offer of Judgment is made solely for the purposes specified in Rule 68, and is not to be construed either as an admission that NGI is liable in this action, or that Plaintiff has suffered any damage. All liability is denied.

4. If Plaintiff rejects this Offer of Judgment, then, pursuant to Rule 68, if any judgment rendered against NGI is less than this offer, NGI may seek to recover any additional costs and disbursements incurred in defense of Plaintiff’s claims, then accrued at the conclusion

of this case, if applicable. Also, Plaintiff must pay Plaintiff's own costs and attorney fees incurred after making this Offer of Judgment, as well as the costs of Defendant. *See Tai Van Le v. University of Pennsylvania*, 321 F.3d 403 (3d Cir. 2003); *O'Brien v. City of Greers Ferry*, 873 F.2d 1115, 1120 (8th Cir. 1989); *Said v. Virginia Commonwealth Uni./Medical College*, 130 F.R.D. 60; 1990 U.S. Dist. LEXIS 2406 (E.D. Va. March 5, 1990).

FINEMAN KREKSTEIN & HARRIS, P.C.

By: /S/ Richard J. Perr  
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Attorneys for Defendant

Dated: March 30, 2015

## CERTIFICATE OF SERVICE

I, RICHARD J. PERR, ESQUIRE, hereby certify that on or about this date, I served a true and correct copy of the foregoing electronically, or by first class mail, postage prepaid, or telecopy on the following:

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/S/ Richard J. Perr

RICHARD J. PERR, ESQUIRE

Dated: March 30, 2015